Before the
Public Service Commission of South Carolina

Docket No. 2021-4-G

Annual Review of Purchased Gas Adjustment and
Gas Purchasing Policies of Piedmont Natural Gas Company, Inc.

Testimony & Exhibits of Jeffrey Patton

On Behalf Of

Piedmont Natural Gas Company, Inc.

Piedmont Natural Gas

June 2, 2021

Q. Please state your name and your business address.

A. My name is Jeffrey Patton. My business address is 4720 Piedmont Row Drive, Charlotte, North Carolina.

Q. By whom and in what capacity are you employed?

A. I am employed by Duke Energy Corporation ("Duke") and work on behalf of Piedmont Natural Gas Company, Inc. ("Piedmont" or the "Company"), a wholly owned subsidiary of Duke, as the Manager of Pipeline Services.

Q. Please describe your educational and professional background.

A. I graduated from Mississippi State University with a Bachelor of Science Degree in Mechanical Engineering in 1996. In 1998, I graduated from Auburn University with a Master of Business Administration, Finance concentration. I was employed by Southern Company from 1998 to 2003 in various roles in Generation Planning and Development, as well as Energy Marketing. I was employed by Consolidated Edison from 2004 to 2005 as a Senior Rate Analyst. I served as a Senior Business Financial Analyst at Progress Energy from 2005 to mid-2008 and was responsible for wholesale electric revenue forecasting. From mid-2008 to early 2019, I was an Originator in the Fuels & Systems Optimization Department for Progress Energy (which merged with Duke), and I was responsible for the procurement of natural gas supply, transportation, and storage services for Duke's natural gas-fired power generation facilities. In February 2019, I accepted my current position as Manager of Pipeline Services.

Q. Please describe the scope of your present responsibilities.

A. My current major responsibilities include the supervision of pipeline capacity planning and relations, annual design day and daily forecasting for Piedmont. In addition, I am responsible for oversight of activities at the Federal Energy Regulatory Commission ("FERC") regarding interstate pipelines and storages that the Company utilizes for transportation and storage services.

Q. Have you previously testified before this Commission or any other regulatory authority?

A. Yes. I testified before this Commission in Docket Number 2020-4-G and before the North Carolina Utilities Commission in Piedmont's Annual Review of Gas Costs in Docket Number G-9, Sub 771.

Q. What is the Review Period in this docket?

A. The Review Period is April 1, 2020, through March 31, 2021.

Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony is to discuss the market requirements of Piedmont's South Carolina customers for the Review Period. My testimony is also forward-looking, discussing how Piedmont plans to satisfy the evolving market requirements of its South Carolina customers in the future. Specifically, my testimony will discuss how Piedmont projects changes in customer demand in those markets as part of its planning process, the capacity acquisition policies and practices we employ to serve those markets, and the efforts undertaken by Piedmont at the FERC on behalf of its customers to ensure that interstate transportation and storage services are reasonably priced.

Q. As background, please give a general description of Piedmont and its market in South Carolina.

A. Piedmont is a local distribution company principally engaged in the purchase, distribution, and sale of natural gas to more than 1 million customers in South Carolina, North Carolina, and the metropolitan area of Nashville, Tennessee. Piedmont currently serves approximately 155,150 customers in its South Carolina service territory, which encompasses areas within Anderson, Greenville, Spartanburg, and Cherokee counties. During the Review Period, Piedmont delivered 64,972,824 dekatherms ("dts") of natural gas to its South Carolina customers. The majority of Piedmont's customers are residential, who directly use natural gas in their home primarily for space heating and water heating needs. Piedmont also serves non-residential customers, mainly commercial and industrial entities, and power generators.

For purposes of the market requirements planning that I discuss in my testimony herein, it is important to conceptualize Piedmont's provision of regulated natural gas service to its customers into two distinct markets: the firm market (principally serving residential, small commercial and small industrial customers) and the interruptible market (principally large commercial and industrial customers). Although Piedmont competes with electricity for the attachment of firm customers, once attached these customers generally have no readily available alternative source of energy and depend on natural gas for their basic space heating or utility needs.

During the Review Period, 60,449,608 dts, or approximately 93%, of Piedmont's South Carolina deliveries were to the firm market.

In the interruptible market, Piedmont competes on a month-to-month and day-to-day basis with alternative sources of energy, primarily fuel oil or propane and, to a lesser extent, coal or wood. These larger commercial and industrial customers will buy alternate fuels when they are less expensive than natural gas. During the Review Period, 4,523,216 dts, or approximately 7% of Piedmont's South Carolina deliveries were to the interruptible market.

Both the firm market and interruptible market can be further bifurcated into two categories of service: sales services and transportation service. The regulated natural gas service provided by Piedmont to its South Carolina customers under every one of its Commission-approved Rate Schedules is delineated as either firm service or interruptible service and is also delineated as either sales service or transportation service. Therefore, there are four major categories of the market requirements for Piedmont's customers: firm sales service, firm transportation service, interruptible sales service, and interruptible transportation service.

Q. Do the market requirements of Piedmont's South Carolina customers change from year-to-year?

A. Yes. The market requirements of Piedmont's South Carolina customers continue to increase year-over-year because Piedmont's customer base in South Carolina continues to grow. Such growth is most robust in the residential sector. As mentioned above, Piedmont currently serves approximately 155,000 customers in South Carolina. One year ago, as mentioned in my testimony last year, Piedmont had about 152,000 customers in South Carolina. Therefore, understanding and projecting customer growth is an important component of the planning Piedmont undertakes to ensure it will be able to satisfy the market requirements of its South Carolina customers. Absent the incorporation of customer growth in its planning process, Piedmont would be unable to ensure the reliable provision of firm natural gas service to its firm sales customers, most critically in the winter season.

Q. How does Piedmont develop its customer growth projections?

A. Piedmont reviews historical customer additions, holds discussions with various business leaders/trade allies and field sales employees, and considers forecasts of local, regional and national business drivers (i.e., economic conditions, demographics, etc.) to derive projections of the change in its customer count over time. Presently, Piedmont anticipates that its overall customer base in South Carolina will continue to steadily increase largely due to the positive regional and local economic outlook continuing to support the pace of new residential building

Q. In its planning to satisfy customer requirements during the Review Period, how did the Company calculate its Design Day requirements for Winter 2020 - 2021?

A. Piedmont's Design Day calculations for Winter 2020-2021 were performed using the same methodology as described in my testimony for last year's

Annual Review proceeding. In summary, Piedmont performed linear regression analysis of its most recent customer data (actual customer sendout data from November 2015 through March 2020 for all customer classes) so as to update its understanding of how our customers use natural gas for base load purposes and in response to weather (i.e. usage per heating degree day). Piedmont then adjoined that customer usage update with its customer growth projection for Winter 2020 – 2021, inclusive of a five percent (5%) reserve margin, in order to arrive at its Design Day requirements for Winter 2020 – 2021. I explain the need for such a reserve margin in the Company's Design Day requirements planning later in my testimony.

Q. Does Piedmont believe that energy conservation measures utilized by customers are applicable when formulating Design Day requirements?

A. Based on observable customer usage patterns, Piedmont believes that such measures are generally being utilized by our customers, but Piedmont has not seen evidence that conservation/reduced usage is occurring during Design Day conditions, or during extended cold weather snaps in winter. For example, during the winter of 2017-2018, a particularly cold weather event occurred which gave Piedmont an opportunity to refresh its data and analyze customers' behavior during extremely cold weather. As in the past, we continued to observe that customers tend to conserve for the first few days of colder temperatures, but then turn up the thermostat in response to the colder temperatures. Thereafter, once adjusted to a warmer setting, customers appear to become less focused on conservation and more focused on comfort and leave the thermostat at the warmer level for a few days even as temperatures start to moderate. This pattern is illustrated in **Exhibit__ (JCP-3)**. Given what Piedmont experienced in the winter of 2017 - 2018 as a customer response to colder temperatures in this pattern, the Company is confident this conservative approach to Design Day forecasting is the most prudent approach. Piedmont's focus has been and continues to be to fully and reliably serve our firm sales customers on a Design Day.

Q. What were the Design Day demand requirements used by the Company for planning purposes during the Review Period, the number of heating degree days, dts per heating degree day, customer growth rates and supporting calculations used to determine the Design Day requirement?

A. Please see **Exhibits_(JCP-4A, 4B and 4C).**

Q. What was the estimated base load demand requirement of the firm markets for the Review Period?

A. Please see **Exhibit__ (JCP-4A).**

Q. Does the Company plan for a reserve margin to accommodate statistical anomalies, unanticipated supply or capacity interruptions, force majeure, emergency gas usage or colder-than-design day weather?

A. Yes, the Company computes a five percent (5%) reserve margin and arranges for supply and capacity to provide delivery of the reserve margin for events such as those listed above. This reserve margin is reflected in **Exhibit__ (JCP-5C).**

Q. In its planning to satisfy customer requirements during the Review Period, how did the Company calculate its requirements for days other than Design Day during Winter 2020 – 2021?

A. Piedmont constructed a load duration curve to forecast the Company's firm sales market requirements for design winter weather conditions. The supply requirements were plotted in descending order of magnitude, with existing pipeline capacity and storage resources overlaid to expose any supply shortfalls. The load duration curve for the Winter 2020 - 2021, as forecasted in the immediate planning for Winter 2020 – 2021, is shown in **Exhibit_(JCP-1A)**. For ease of comparison, I plotted the actual Winter 2020 – 2021 experience in **Exhibit_(JCP-1B**).

Q. Did the Company appropriately plan for satisfying its customer requirements for the Review Period including Winter 2020 – 2021?

A. Yes. And, I note that Piedmont fully and reliably satisfied the firm sales requirements of its South Carolina customers during the Review Period.

<u>Design Day and Winter Season Planning for Future Periods: Winter 2021 – 2022 through Winter 2025 – 2026</u>

Q. Has the Company recently made any changes to its calculation of Design Day requirements?

A. Yes, Piedmont recently made a refinement of its methodology used to determine its Design Day requirement for each year. The revised methodology was used for the Design Day projections for this coming winter (Winter 2021 – 2022) and winters thereafter, as shown in **Exhibits_(JCP-5A, 5B, and 5C)** attached hereto**.**

Q. Please explain the nature of this recent refinement to the Company's calculation of Design Day requirements.

A. The methodology Piedmont used to determine its Design Day requirements for last winter, Winter 2020 – 2021, relied upon total firm customer usage data (which consists of usage by firm sales customers and usage by firm transportation customers) for the linear regression to calculate the base load and the usage per Heating Degree Day ("HDD") components. After calculating projected total firm sales and transportation sendout at the Design Day HDD using these components, the Company then applied a five percent (5%) reserve margin. From that subtotal, Piedmont then deducted the projected peak firm transportation usage, estimated to be an amount equivalent to such usage from the prior winter, to arrive at the total firm sales demand for Design Day.

The Company recently decided to refine its process to develop the total firm sales demand amount for Design Day going forward, starting with such calculation for this coming winter (Winter 2021 – 2022). Specifically, Piedmont modified the linear regression to be performed only on firm sales customer usage data as opposed to total firm customer usage data. The Company then calculates the projected total firm sales sendout at the Design Day HDD, upon which it applied the five percent (5%) reserve margin to arrive at the total firm sales demand for Design Day. As a part of this Design Day methodology refinement, the Company also reviewed its historic temperature data. From that review, Piedmont determined that an update of Design Day temperature from 8.71 to 8.69 degrees Fahrenheit was warranted. Such update in Design Day temperature comports with a change in Design Day HDD from 56.29 HDD to 56.31 HDD. This modification to the Design Day HDD was warranted due to the allocation of weather station percentages based on the current customer service areas.

Q. Why did the Company make this refinement to its calculation of Design Day requirements for the future?

A. This revised methodology is a more direct approach to the calculation of Design Day requirements for firm sales customers because it eliminates the complexity of deducting firm transportation volumes based on peak usage from the prior winter that are dependent on the temperature observed on that peak day which may not reflect the usage at design day conditions. Additionally, it is more appropriate to calculate a reserve margin on a firm sales only sendout rather than on a total firm sales and firm transportation sendout.

Q. Did this refinement significantly impact the Company's Design Day requirements for the future?

A. No. While this refinement is an improvement to the Company's methodology for determining Design Day requirements, it did not yield a significant change to the quantification of the Design Day requirement. To illustrate this, please see **Exhibit_(JCP-8)**, which shows the calculation of Design Day requirements for Winter 2021-2022 based on the previous methodology compared to the newly refined methodology. The previous methodology calculated a total firm sales demand of 1,437,965 dts compared to the new methodology of 1,431,452 dts, a difference of 6,513 dts or approximately 0.5%.

Q. What are the newly forecasted Design Day demand requirements used by the Company for planning purposes for the upcoming winter (Winter 2021-2022) and for the next four winter seasons, the amount of heating degree days, dts per heating degree day, customer growth rates and supporting calculations used to determine the Design Day requirement amounts?

A. Please see **Exhibits_(JCP-5A, 5B, and 5C).**

Q. What are the newly forecasted base load demand requirements for the upcoming winter and the next four winter seasons?

A. Please see **Exhibit__ (JCP-5A).**

Q. How has the Company calculated its requirements for days other than Design Day for the coming winter season (Winter 2021 – 2022)?

A. Piedmont employed the same process used to develop its forecasted load duration curve for Winter 2021 – 2022, as described earlier in my testimony. The current load projection for this coming winter (Winter 2021-2022) is shown in **Exhibit_(JCP-2).**

Supply & Capacity Planning to Satisfy Customer Demand

Q. Is it possible to maintain capacity rights that exactly match Piedmont's calculated Design Day demand plus reserve margin at all times?

A. No. Capacity additions are acquired in "blocks" of additional transportation, storage, or LNG capacity as current and future needs are identified to ensure Piedmont's ability to serve its customers based on the options available at that time. As a practical matter, this means that at any given moment in time, Piedmont's actual capacity assets will vary somewhat from its forecasted demand capacity requirements. This aspect of capacity planning is unavoidable but Piedmont attempts to mitigate the impact of any mismatch through its use of bridging services, capacity release, and off-system sales activities.

Q. What process does Piedmont undertake to acquire firm capacity to meet its growing firm sales market requirements?

A. Piedmont secures incremental capacity to meet the growth requirements of its firm sales customers consistent with its "best cost" policy, as described in the testimony of Company Witness Todd Breece. To implement this policy, Piedmont attempts to contract for timely and cost-effective capacity that is tailored to the demand characteristics of its market. Piedmont evaluates interstate pipeline capacity and storage offerings expected to be available at the time that it is determined that additional future firm delivery service is required, or prior to the expiration of existing firm delivery service contracts. The Company attempts to match the days of service of new incremental transportation capacity to the duration of its incremental demand on the most economical basis possible. Piedmont attempts to acquire peaking services to meet projected peak day demand, storage services to meet projected seasonal demand, and year-round firm transportation services to meet base load demand and in order to provide available capacity for storage inventory replenishment. However, service choices are limited to those offered during the time period being evaluated.

Q. Please describe how the Company plans to satisfy its firm sales requirements for the next five winter seasons.

A. Based on the current projections of its firm sales demand, Piedmont believes that it has sufficient supply and capacity rights to meet its customer needs for the upcoming winter season. Piedmont owns and operates two on-system liquefied natural gas ("LNG") peaking facilities in the Carolinas, with a third currently under construction and going in-service this summer. Piedmont increased the Design Day output of its Bentonville LNG peaking facility from 90,000 dts per day to 110,000 dts per day beginning in the winter 2020 – 2021 season, and the new Robeson LNG facility will be able to provide 200,000 dts per day of peaking supply of natural gas starting this upcoming winter season.

The capacity portfolio for the 2021-2022 winter season and beyond will be restructured to include Robeson LNG using the "best cost" gas purchasing policy while taking into account the customer load profile. This forthcoming restructuring is anticipated to reduce the current capacity surplus shown on Line 47 of **Exhibit__(JCP 5C)**, which illustrates the Company's plans to supply its estimated future growth requirements during the next five-year period beginning with this upcoming winter season.

Q. Please discuss Piedmont's plans to address the future requirements that would have been met by the Atlantic Coast Pipeline ("ACP")?

A. Piedmont had contracted for 160,000 dts per day of firm pipeline service on the ACP Project in order to provide additional upstream capacity, supply access, and infrastructure. In light of ACP's cancellation of the project in July 2020, Piedmont has been evaluating interstate pipeline alternatives to serve future demand combined with system infrastructure requirements that would have been met by ACP.

Q. Has the Company made any changes to its capacity rights during the Review Period?

A. The Company did not make any changes to its capacity rights during the Review Period.

Q. Please describe the Company's interest and position on any issues before the FERC that may have an impact on the Company's operations and a description of the status of each proceeding described.

A. The Company routinely intervenes and participates in interstate natural gas pipeline proceedings before the FERC. A current summary of the proceedings in which Piedmont is a party is included in **Exhibit__ (JCP-6).**

Q. Does this conclude your testimony?

A. Yes, it does.

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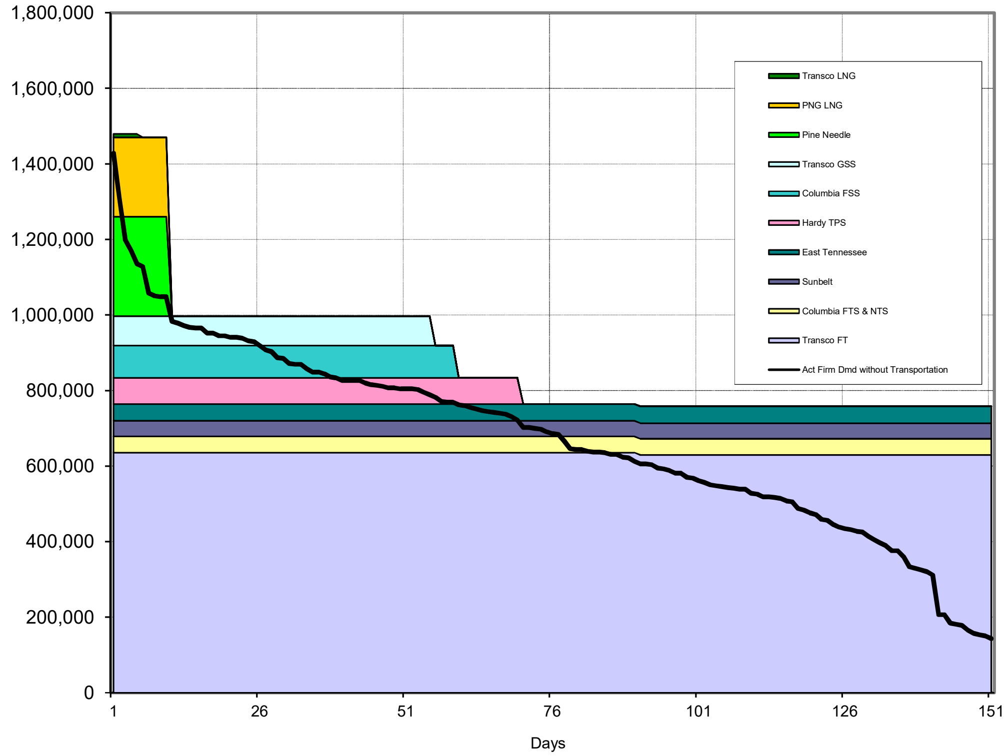
Index - JCP Exhibits

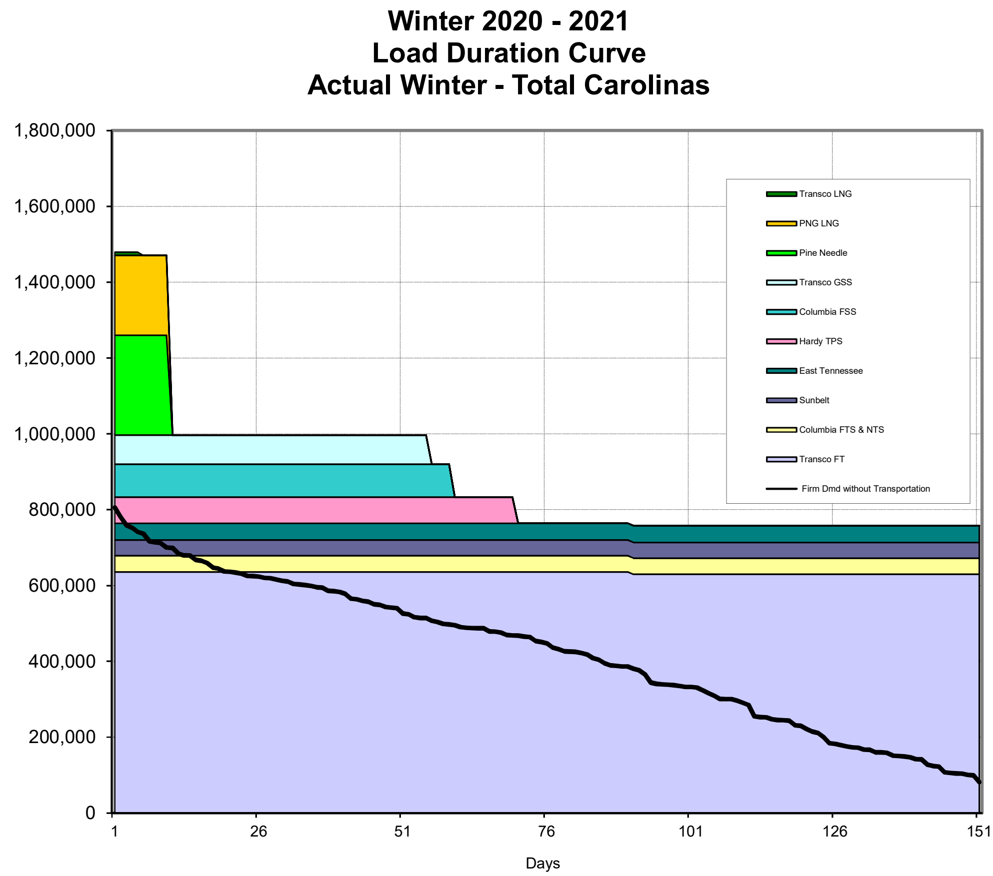
Exhibit___ (JCP-1A)

Forecast Winter 2020 - 2021
Load Duration Curve
Design Winter - Total Carolinas



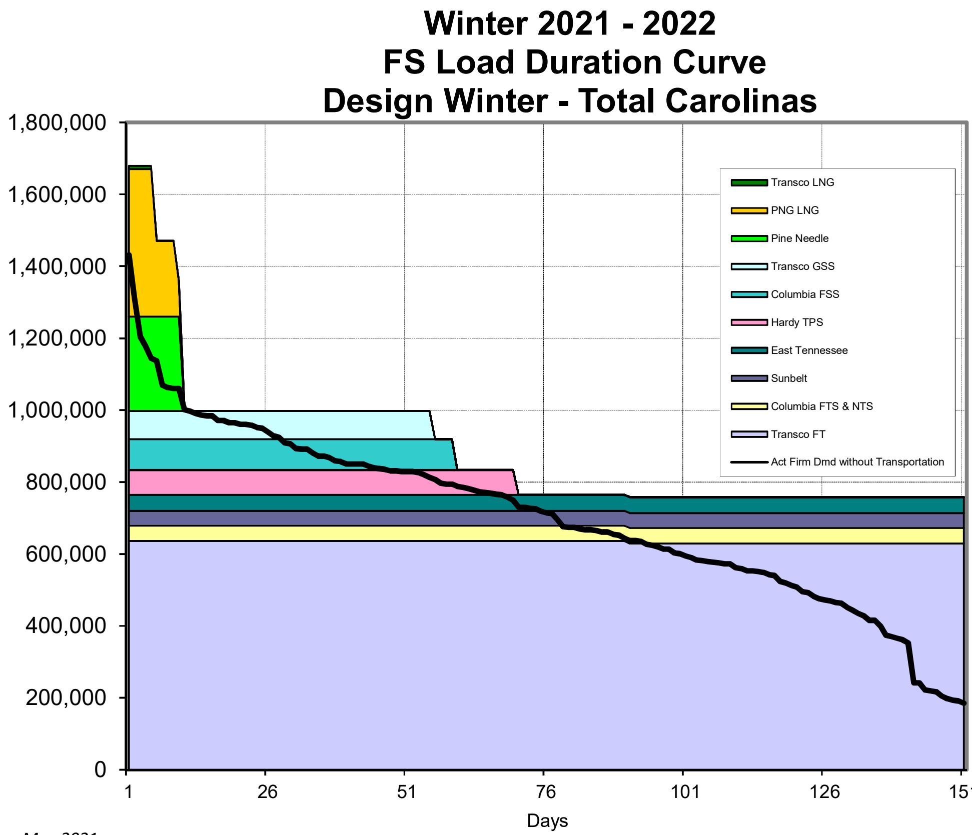
May 2020

Exhibit___ (JCP-1B)


Winter 2020 - 2021
Load Duration Curve
Actual Winter - Total Carolinas
1,800,000
1,600,000
1,400,000
1,200,000
1,000,000
800,000
600,000
400,000
200,000
0
1
26
51
76
101
126
151
Days
Transco LNG
PNG LNG
Pine Needle
Transco GSS
Columbia FSS
Hardy TPS
East Tennessee
Sunbelt
Columbia FTS & NTS
Transco FT
Firm Dmd without Transportation

May 2021

Exhibit___ (JCP-2)


Winter 2021 - 2022
FS Load Duration Curve
Design Winter - Total Carolinas
1,800,000
1,600,000
1,400,000
1,200,000
1,000,000
800,000
600,000
400,000
200,000
0
1
26
51
76
101
126
151
Days
Transco LNG
PNG LNG
Pine Needle
Transco GSS
Columbia FSS
Hardy TPS
East Tennessee
Sunbelt
Columbia FTS & NTS
Transco FT
Act Firm Dmd without Transportation

May 2021

Exhibit___ (JCP-3)

2017-2018 Weather Event

Carolinas: December 2017 - January 2018 Cold Snap

Date	Firm Sales & Firm Transportation Less Base Load	HDDs	Usage per HDD Less Base Load
12/30/2017	530,098	28.2	18,798
12/31/2017	836,623	41.3	20,257
1/1/2018	975,969	46.2	21,125
1/2/2018	1,011,608	42.0	24,086
1/3/2018	972,138	39.3	24,736
1/4/2018	1,037,719	44.5	23,320
1/5/2018	1,011,070	42.8	23,623
1/6/2018	1,015,633	44.8	22,670
1/7/2018	964,821	40.5	23,823
1/8/2018	714,357	27.8	25,696

All usage is in dekatherms.
Base load equals 164,485 dekatherms.

Exhibit___ (JCP-4A)

Piedmont Natural Gas Company, Inc. Exhibit_(JCP-4A)
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Winter 2020 - 2021 Design Day Start Point

Design Day Forecast 2020 - 2021	**Total Carolinas**	
Baseload - Firm Sales & Firm Transportation	209,260	
Design Day Temperature	8.71	
Design Day HDD	56.29	
Estimated increase in Firm Sales & Transportation Usage per degree day	22,313	
Total Firm Sales & Transportation usage for total 56.29 HDDs	1,465,250	
Projected Net Growth Rate	1.267%	
System Design Day Firm Sendout 2020 - 2021	1,483,821	
TOTAL NEW FIRM SALES PICKED UP MID YEAR & ANNUAL ELECTIONS	735	
TOTAL FIRM SALES MOVED TO TRANSPORT ANNUAL ELECTIONS	(1,363)	
TOTAL NET NUMBER - FIRM SALES PICKED UP	(628)	
Firm Sales Contract Commitment - GE	333	
Firm Sales Contract Commitment - City of Wilson	3,900	
Firm Sales Contract Commitment - City of Rocky Mount	3,000	
Total Firm Sales Contract Commitment	7,233	
Prior Winter Firm Transport (Total FT DTs consumed on highest winter day)	136,653	
Date of occurrence - January 21, 2020	126,658	NC
Date of occurrence - January 21, 2020	9,995	SC

Exhibit___ (JCP-4B)

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Exhibit_(JCP-4B)

Customer Growth for Winter Design Day 2020-2021

Actual Customer Count by Year as of March 31 Through 2020
Projected Customer Count by Year as of March 31 Through 2023

	TOTAL RESIDENTIAL & COMMERCIAL CUSTOMER COUNT										
	ACTUAL								PROJECTION		
	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Total NC & SC	826,993	839,328	852,754	865,950	876,464	891,191	901,513	915,099	926,721	939,788	954,354
	1.06%	1.49%	1.60%	1.55%	1.21%	1.68%	1.16%	1.51%	1.27%	1.41%	1.55%

Exhibit___ (JCP-4C)

Carolinas Design Day Demand & Supply Schedule - Winter 2020 - 2021

Design Day Temperature of 8.71 Degrees (56.29 HDDs)

Line	(All Values in Dt/d)	Type of Contract	Days	Note	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25
	Carolinas Demand Net Growth Rate				1.2674%	1.4098%	1.5465%	1.5506%	1.5545%
	DEMAND			**Winter Period:**	**2020 - 21**	**2021 - 22**	**2022 - 23**	**2023 - 24**	**2024 - 25**
1	System Design Day Firm Sendout				1,483,821	1,504,104	1,527,365	1,551,049	1,575,159
2	Mid Year Firm Sales Pick Up				**735**				
3	Mid Year Firm Sales Deduct (move to Firm Transport)				**(1,363)**				
4	Subtotal Sendout plus Mid Year Pickup				1,483,194	1,504,104	1,527,365	1,551,049	1,575,159
5	Special Contract Firm Sales Commitment				**7,233**	7,233	7,233	7,233	7,233
6	Total Firm Design Day Demand				1,490,427	1,511,337	1,534,598	1,558,282	1,582,392
7	Reserve Margin on Design Day Demand (5%)				74,521	75,567	76,730	77,914	79,120
8	*Subtotal Demand*				**1,564,948**	**1,586,903**	**1,611,328**	**1,636,196**	**1,661,512**
9	*Less:*								
10	Firm Transportation Without Standby				(136,653)	(129,000)	(129,000)	(129,000)	(129,000)
11	***Total Firm Sales Demand***				**1,428,295**	**1,457,903**	**1,482,328**	**1,507,196**	**1,532,512**
12	***SUPPLY CAPACITY***								
13	***Firm Transportation***	***Type of Contract***	Days						
14	**Transco**	FT	365		301,016	301,016	301,016	301,016	301,016
15	**Transco**	FT	365		6,440	6,440	6,440	6,440	6,440
16	**Transco**	FT SE '94/95/96	365		129,485	129,485	129,485	129,485	129,485
17	**Transco**	Sunbelt	365		41,400	41,400	41,400	41,400	41,400
18	**Transco**	VA Southside	365		20,000	20,000	20,000	20,000	20,000
19	**Transco**	Leidy	365		100,000	100,000	100,000	100,000	100,000
20	**Columbia Gas**	FTS	365		9,801	9,801	9,801	9,801	9,801
21	**Columbia Gas**	FTS	365	4	23,000	0	0	0	0
22	**Columbia Gas**	NTS	365		10,000	10,000	10,000	10,000	10,000
23	**East TN (MGT Upstream)**	FT	365	4	19,578	0	0	0	0
24	**Atlantic Coast Pipeline ***	FT	365		0	**0**	**160,000**	**160,000**	**160,000**
25	***Total Year Round FT***				660,720	618,142	778,142	778,142	778,142
26									
27	**Transco**	FT Southern Expansion	151		72,502	72,502	72,502	72,502	72,502
28	**East TN (TETCO Upstream)**	FT	151	1,4	24,798	0	0	0	0
29	**Transco**	FT	90		6,314	6,314	6,314	6,314	6,314
30	***Total Winter Only FT***				103,614	78,816	78,816	78,816	78,816
31									
32	***Firm Transportation Subtotal***				**764,334**	**696,958**	**856,958**	**856,958**	**856,958**
33									
34	**Hardy Storage**	HSS	70	4	68,835	0	0	0	0
35	**Dominion**	GSS	60	2	0	0	0	0	0
36	**Columbia Gas**	FSS/SST	59	4	86,368	5,199	5,199	5,199	5,199
37	**Transco**	GSS	55		77,475	77,475	77,475	77,475	77,475
38									
39	***Total Seasonal Storage***				**232,678**	**82,674**	**82,674**	**82,674**	**82,674**
40									
41	***Peaking Capacity***								
42	**Piedmont**	LNG - Huntersville	10		100,000	100,000	100,000	100,000	100,000
43	**Piedmont**	LNG - Bentonville	9.09		110,000	110,000	110,000	110,000	110,000
44	**Transco**	Pine Needle	10		263,400	263,400	263,400	263,400	263,400
45	**Transco**	LNG (formerly LG-A)	5		8,643	8,643	8,643	8,643	8,643
46	**Piedmont**	LNG - Robeson	10	3	0	200,000	200,000	200,000	200,000
47	***Peaking Supplies Total***				**482,043**	**682,043**	**682,043**	**682,043**	**682,043**
48									
49	***Total Capacity***				**1,479,055**	**1,461,675**	**1,621,675**	**1,621,675**	**1,621,675**
50					**50,760**	**3,772**	**139,347**	**114,479**	**89,163**

** Atlantic Coast Pipeline scheduled to come on line in the first half of 2022*

1East TN capacity is 365 days, however the upstream TETCO capacity delivering to East TN is 151 days

2Beginning in FY2015, Dominion capacity removed as available capacity on design day due to non-firm backhaul from Transco Zone 6.

3The Robeson LNG facility is anticipated to be completed in the summer of 2021, and therefore is forecasted to provide peaking support starting winter 2021-2022.

4The capacity portfolio for the 2021-2022 winter season and beyond will be restructured to include Robeson LNG using the "best cost" gas purchasing policy while taking into account the customer load profile. The removal of identified capacity contacts beginning with the 2021 - 2022 winter season represent an illustrative scenario in which Piedmont releases upstream capacity to restructure the portfolio based on the current forecasted projections.

Exhibit___ (JCP-5A)

Piedmont Natural Gas Company, Inc. Exhibit_(JCP-5A)
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Winter 2021 - 2022 Design Day Start Point

Design Day Forecast 2021 - 2022	**Total Carolinas**
Baseload - Firm Sales	122,316.59
Design Day Temperature	8.69
Design Day HDD	56.31
Estimated increase in Firm Sales Usage per degree day	21,541.56
Total Firm Sales usage for total 56.31 HDDs	1,335,322
Projected Net Growth Rate	1.529%
System Design Day Firm Sendout 2021 - 2022	1,355,743
TOTAL NEW FIRM SALES PICKED UP MID YEAR & ANNUAL ELECTIONS	886
TOTAL FIRM SALES MOVED TO TRANSPORT ANNUAL ELECTIONS	(574)
TOTAL NET NUMBER - FIRM SALES PICKED UP	312
Firm Sales Contract Commitment - GE	333
Firm Sales Contract Commitment - City of Wilson	3,900
Firm Sales Contract Commitment - City of Rocky Mount	3,000
Total Firm Sales Contract Commitment	7,233

Exhibit___ (JCP-5B)

Piedmont Natural Gas Company, Inc.
Docket No. 2021-4-G

Exhibit_(JCP-5B)

Customer Growth for Winter Design Day 2021-2022

Actual Customer Count by Year as of March 31 Through 2021
Projected Customer Count by Year as of March 31, 2022 Through 2024

	TOTAL RESIDENTIAL & COMMERCIAL CUSTOMER COUNT										
	ACTUAL								PROJECTION		
	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Total NC & SC	839,328	852,754	865,950	876,464	891,191	901,513	915,099	936,163	950,767	965,979	981,725
	1.49%	1.60%	1.55%	1.21%	1.68%	1.16%	1.51%	2.30%	1.53%	1.56%	1.60%

Exhibit___ (JCP-5C)

Carolinas Design Day Demand & Supply Schedule - Winter 2021 - 2022

Design Day Temperature of 8.69 Degrees (56.31 HDDs)

Line	*(All Values in Dt/d)*		Days		2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26
		Carolinas Demand Net Growth Rate			1.53%	1.56%	1.60%	1.63%	1.67%
	DEMAND	Winter Period:			2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26
1	System Design Day Firm Sendout				1,355,743	1,377,216	1,399,196	1,421,982	1,445,680
2	Mid Year Firm Sales Pick Up				**886**				
3	Mid Year Firm Sales Deduct (move to Firm Transport)				**(574)**				
4		Subtotal Sendout plus Mid Year Pickup			1,356,055	1,377,216	1,399,196	1,421,982	1,445,680
5	Special Contract Firm Sales Commitment				**7,233**	7,233	7,233	7,233	7,233
6	Total Firm Design Day Demand				1,363,288	1,384,449	1,406,429	1,429,215	1,452,913
7	Reserve Margin on Design Day Demand (5%)				68,164	69,222	70,321	71,461	72,646
8	***Total Firm Sales Demand***				**1,431,452**	**1,453,671**	**1,476,751**	**1,500,676**	**1,525,559**
9									
10	***SUPPLY CAPACITY***								
11	***Firm Transportation***	***Type of Contract***	Days						
12	**Transco**	FT	365		301,016	301,016	301,016	301,016	301,016
13	**Transco**	FT	365		6,440	6,440	6,440	6,440	6,440
14	**Transco**	FT SE '94/95/96	365		129,485	129,485	129,485	129,485	129,485
15	**Transco**	Sunbelt	365		41,400	41,400	41,400	41,400	41,400
16	**Transco**	VA Southside	365		20,000	20,000	20,000	20,000	20,000
17	**Transco**	Leidy	365		100,000	100,000	100,000	100,000	100,000
18	**Columbia Gas**	FTS	365		9,801	9,801	9,801	9,801	9,801
19	**Columbia Gas**	FTS	365		23,000	23,000	23,000	23,000	23,000
20	**Columbia Gas**	NTS	365		10,000	10,000	10,000	10,000	10,000
21	**East TN (MGT Upstream)**	FT	365		19,578	19,578	19,578	19,578	19,578
22	***Total Year Round FT***				660,720	660,720	660,720	660,720	660,720
23									
24	**Transco**	FT Southern Expansion	151		72,502	72,502	72,502	72,502	72,502
25	**East TN (TETCO Upstream)**	FT	151	1	24,798	24,798	24,798	24,798	24,798
26	**Transco**	FT	90		6,314	6,314	6,314	6,314	6,314
27	***Total Winter Only FT***				103,614	103,614	103,614	103,614	103,614
28									
29	***Firm Transportation Subtotal***				**764,334**	**764,334**	**764,334**	**764,334**	**764,334**
30									
31	**Hardy Storage**	HSS	70		68,835	68,835	68,835	68,835	68,835
32	**Dominion**	GSS	60	2	0	0	0	0	0
33	**Columbia Gas**	FSS/SST	59		86,368	86,368	86,368	86,368	86,368
34	**Transco**	GSS	55		77,475	77,475	77,475	77,475	77,475
35									
36	***Total Seasonal Storage***				**232,678**	**232,678**	**232,678**	**232,678**	**232,678**
37									
38	***Peaking Capacity***								
39	**Piedmont**	LNG - Huntersville	10		100,000	100,000	100,000	100,000	100,000
40	**Piedmont**	LNG - Bentonville	9		110,000	110,000	110,000	110,000	110,000
41	**Transco**	Pine Needle	10		263,400	263,400	263,400	263,400	263,400
42	**Transco**	LNG (formerly LG-A)	5		8,643	8,643	8,643	8,643	8,643
43	**Piedmont**	LNG - Robeson	5	3	200,000	200,000	200,000	200,000	200,000
44	***Peaking Supplies Total***				**682,043**	**682,043**	**682,043**	**682,043**	**682,043**
45									
46	***Total Capacity***				**1,679,055**	**1,679,055**	**1,679,055**	**1,679,055**	**1,679,055**
47					**247,603**	**225,384**	**202,304**	**178,379**	**153,496**

1East TN capacity is 365 days, however the upstream TETCO capacity delivering to East TN is 151 days

2Beginning in FY2015, Dominion capacity removed as available capacity on design day due to non-firm backhaul from Transco Zone 6.

3The Robeson LNG facility is anticipated to be completed in the summer of 2021, and therefore is forecasted to provide peaking support starting winter 2021-2022. The capacity portfolio for the 2021-2022 winter season and beyond will be restructured to include Robeson LNG using the "best cost" gas purchasing policy while considering the customer load profile and future requirements that would have been met by the Atlantic Coast Pipeline.

Exhibit___ (JCP-6)

Piedmont's FERC Filing Activity

Docket Number	Pipeline / Applicant	Filed Date	Action	Description	Status of Docket
RP21-561	Columbia Gas Transmission, LLC	3/1/2021	Intervened on 3/15/2021	TCO filed revised tariff records to establish its Electric Power Costs Adjustment (EPCA) for the annual period beginning April 1, 2021. TCO requested that the revised tariff records become effective April 1, 2021.	On 3/31/2021, the Commission issued its Order Accepting Annual Tracker Filing.
RP21-582	Columbia Gas Transmission, LLC	3/1/2021	Intervened on 3/15/2021	TCO filed a revised tariff record to adjust its retainage percentage consistent with its Retainage Adjustment Mechanism (RAM). TCO requested that the revised tariff record become effective April 1, 2021.	On 3/29/2021, the Commission issued a letter order accepting TCO's filing.
RP21-579	Transcontinental Gas Pipe Line Company, LLC	3/1/2021	Intervened on 3/15/2021	Transco filed revised tariff records to reflect net changes in the Transmission Electric Power (TEP) rates. Transco requested that the revised tariff records become effective April 1, 2021.	On 3/19/2021, the Commission issued a letter order accepting Transco's filing.
RP21-573	Columbia Gulf Transmission, LLC	3/1/2021	Intervened on 3/15/2021	CGT filed revised tariff records to adjust its retainage percentage consistent with the pipeline's Transportation Retainage Adjustment (TRA). CGT requested that the revised tariff records become effective April 1, 2021.	On 3/31/2021, the Commission issued its Order Accepting Tariff Tracker Filing.
RP21-569	Transcontinental Gas Pipe Line Company, LLC	3/1/2021	Intervened on 3/15/2021	Transco filed revised tariff records reflecting its redetermination of its fuel retention percentages (FRPs) applicable to transportation and storage rate schedules. Transco requested that the revised tariff records become effective April 1, 2021.	On 3/19/2021, the Commission issued a letter order accepting Transco's filing.
RP21-552	Tennessee Gas Pipeline Company, L.L.C.	3/1/2021	Intervened on 3/15/2021	TGP filed revised tariff records to reflect revised incremental fuel and loss retention percentages (F&LR) and the electric power cost rates (EPCR), including revised F&LR and EPCR for service on the Market Component Project facilities. TGP requested that the revised tariff records become effective April 1, 2021.	Settlement discussion are ongoing.
RP21-565	Columbia Gas Transmission, LLC	3/1/2021	Intervened on 3/15/2021	TCO filed revised tariff records to establish its Transportation Costs Rate Adjustment (TCRA) for the annual period beginning April 1, 2021. TCO requested that the revised tariff records become effective April 1, 2021.	On 3/31/2021, the Commission issued its Order Accepting and Suspending Tariff Records, Establishing Hearing Procedures, and Holding Hearing in Abeyance.
RP21-525	Midwestern Gas Transmission Company	2/26/2021	Intervened w/ protest on 3/10/2021	MGT filed its Section 4 Rate Case filing.	Settlement discussion are ongoing.
RP21-515	Midwestern Gas Transmission Company	2/25/2021	Intervened on 3/9/2021	MGT filed its Annual Fuel Retention Adjustment Percentage filing.	On 3/19/2021, the Commission issued a letter order accepting MGT's filing.
RP21-153	Texas Eastern Transmission, LP	10/30/2020	Intervened 0n 11/12/2020	TETCO filed revised tariff records in compliance with a settlement agreement originally approved by the Commission in 1992, and thereafter extended in 2017 in Docket No. RP17-964-000 (PCB Settlement), setting forth the rates under the PCB Settlement from December 1, 2020, through November 30, 2021 (Year 4). TETCO requests that the revised tariff records become effective December 1, 2020. TETCO states that the revised tariff records reflect its estimate of the Year 4 Eligible PCB-Related Costs of approximately $17,417,961, of which, approximately $10,015,328 of the PCB-Related Costs are recoverable pursuant to the Settlement. TETCO states that the total net recoverable PCB related costs of $5,594,477 reflects an IT revenue credit of approximately $19,398, a deferred credit account balance of approximately $4,401,454. TETCO states that pursuant to the Settlement, however, the annual cap applies and, as a result, TETCO has reflected only $5,000,000 in rates. The filing notes that TETCO's most recent rate case established the annual contract quantity floor. For the volumetric allocation pursuant to the Settlement, TETCO has used the annual contract quantities as of the effective date of this filing, which are higher than the applicable annual contract floor. In addition, TETCO states that pursuant to the Rate Case Settlement, it will refund PCB costs recovered from Rate Schedules FTS-7 and FTS-8 during the refund period in the Rate Case Settlement because those rate schedules are not part of the PCB cost recovery process. The Year 4 Eligible PCB-Related Cost component of TETCO's rates is included as a component of TETCO's base tariff or, where applicable, total rates, rather than as a separate surcharge.	On 3/18/2021, the Commission issued a letter order finding no further action is required, and that TETCO's filing is in compliance and accurate.
RP20-980	East Tennessee Natural Gas, LLC	6/30/2020	Intervened and protested on 7/13/2020	East Tennessee is filing a general section 4 rate case.	On 3/3/2021 and 3/16/2021, the Commission issued Orders scheduling settlement conferences.
TRACKED DOCKETS					
RP21-392	Transcontinental Gas Pipe Line Company, LLC	1/19/2021	Intervened on 2/1/2021	Transco filed a revised tariff record in order to update the Delivery Point Entitlement (DPE) for Zone 5. Transco requests that the revised tariff records become effective February 19, 2021.	On 2/3/2021, the Commission issued a letter order accepting Transco's filing.
RP21-351	Columbia Gas Transmission, LLC	12/31/2020	Intervened on 1/12/2021	TCO is filing revised tariff records to change its Capital Cost Recovery Mechanism (CCRM) rate in order to recover its revenue requirement ("Capital Revenue Requirement") for specified capital investments made under its long-term plan to modernize its interstate transportation system and enhance service reliability (Modernization Program). TCO requests that the revised tariff records become effective February 1, 2021.	Several interventions and protests filed. On 1/29/2021, the Commission issued its Order Accepting and Suspending Tariff Records.
RP21-237	Tennessee Gas Pipeline Company, L.L.C.	11/20/2020	Intervened on 12/02/2020	TGP filed its annual cashout report for the twelve-month period ending August 31, 2020. The 2020 cashout report reflects that TGP's cashout operations for the twelve-month period ending August 31, 2020, experienced a loss of $2,186,815. Combined with $28,759,075 of losses rolled-forward from previous cashout periods, the resulting cumulative loss as of August 31, 2020, is $30,945,890. TGP states that because the net cashout balance is less than $4 million, in accordance with the cashout provisions of Rate Schedules LMS-MA and LMS-PA of its tariff, TGP will roll this cumulative loss forward into its next annual cashout period.	Several motions to intervene were filed.
RP21-84	Transcontinental Gas Pipe Line Company, LLC	10/22/2020	Intervened 0n 11/03/2020	Transco filed a penalty sharing report to show penalty sharing amounts distributed to all affected shippers for the 12-month period ending July 31, 2020. Transco states that on October 22, 2020, it distributed penalty sharing amounts to all affected shippers pursuant to Section 54 of the GT&C of its Tariff. The penalty sharing report provides that Transco distributed $7,952.68 to PNG.	
RP21-142	Columbia Gas Transmission, LLC	10/30/2020	Intervened 0n 11/12/2020	TCO filed revised tariff records pursuant to Part VII.49.4 of the GT&C of its Tariff to adjust TCO's Operational Transaction Rate Adjustment (OTRA) for the upcoming 2020 winter season. TCO requests that the revised tariff records become effective December 1, 2020. TCO's OTRA mechanism allows TCO to adjust its OTRA rates for both a summer season and a winter season each year. The seasonal filings address both prospective changes in OTRA costs, as well as prior period over- or under-recoveries. TCO is proposing a monthly reservation rate for Rate Schedules FTS/NTS, TPS and SST service for the 2020 winter season of $0.048 per Dth. The proposed rate reflects current net OTRA costs of $3,491,532 and net under-recovered OTRA costs of $117,631. When compared to the 2020 OTRA summer season rate of $0.039 per Dth, the proposed OTRA monthly reservation rate reflects a reduction in the net OTRA surcharge costs of $218,239, an increase of $89,626 in net under-recovered OTRA true-up surcharge costs and a decrease in seasonal billing determinants to 76,069,690 Dth. The increase in the proposed OTRA monthly reservation rate is primarily driven by a decrease in seasonal billing determinants from the 2020 OTRA summer season. TCO sates that the OTRA monthly reservation rate in the instant filing is consistent with rates implemented in previous winters.	On 11/17/2020, the Commission issued a letter order accepting TCO's revised tariff records to adjust its OTRA.

Piedmont's FERC Filing Activity

RP21-144	Dominion Energy Transmission, Inc.	10/30/2020	Intervened on 11/12/2020	DETI states that the proposed changes are designed to promote the development of RNG within DETI's footprint, while protecting the integrity of the DETI system, the gas-burning equipment of its customers, and the general public. DETI states that it has received interest from numerous RNG developers to deliver gas to the DETI system and is interested in facilitating the acceptance of RNG. RNG composition, however, is different from traditional geological natural gas production in that it contains additional constituents generally not present in the traditional natural gas, known as Constituents of Concern (CoC). These CoCs may have adverse effects on the integrity of the pipeline system, as well as the merchantability of gas. Thus, in order to support the market for the RNG industry, as well as protect the integrity of the DETI system and its downstream customers' facilities, DETI is proposing new specifications for CoCs applicable only to RNG receipts on its system. DETI's proposed revisions to GT&C Section 2 provide that RNG received at designated RNG receipt points must comply with the new CoC specifications, in addition to the generally applicable Section 2 specifications. DETI states that it will designate on its EBB the RNG receipt points subject to the additional constituent limits. DETI states that the inclusion of new streams of natural gas warrant additional gas quality parameters due to the nature of the additional known CoCs in the gas stream. DETI explains that each of these constituents has a differing impact on gas quality, interchangeability, end-use safety/reliability and pipeline integrity and, therefore the limitations set forth below are needed. The table below shows the constituent limits being proposed by DETI.	On 12/16/2020, a Notice of Technical Conference was issued, setting a technical conference for January 28, 2021.
RP21-153	Texas Eastern Transmission, LP	10/30/2020	Intervened 0n 11/12/2020	TETCO filed revised tariff records in compliance with a settlement agreement originally approved by the Commission in 1992, and thereafter extended in 2017 in Docket No. RP17-964-000 (PCB Settlement), setting forth the rates under the PCB Settlement from December 1, 2020, through November 30, 2021 (Year 4). TETCO requests that the revised tariff records become effective December 1, 2020. TETCO states that the revised tariff records reflect its estimate of the Year 4 Eligible PCB-Related Costs of approximately $17,417,961, of which, approximately $10,015,328 of the PCB-Related Costs are recoverable pursuant to the Settlement. TETCO states that the total net recoverable PCB related costs of $5,594,477 reflects an IT revenue credit of approximately $19,398, a deferred credit account balance of approximately $4,401,454. TETCO states that pursuant to the Settlement, however, the annual cap applies and, as a result, TETCO has reflected only $5,000,000 in rates. The filing notes that TETCO's most recent rate case established the annual contract quantity floor. For the volumetric allocation pursuant to the Settlement, TETCO has used the annual contract quantities as of the effective date of this filing, which are higher than the applicable annual contract floor. In addition, TETCO states that pursuant to the Rate Case Settlement, it will refund PCB costs recovered from Rate Schedules FTS-7 and FTS-8 during the refund period in the Rate Case Settlement because those rate schedules are not part of the PCB cost recovery process. The Year 4 Eligible PCB-Related Cost component of TETCO's rates is included as a component of TETCO's base tariff or, where applicable, total rates, rather than as a separate surcharge.	Various motions to intervene and protests were filed in this docket. On 11/30/2020, the Order Accepting and Suspending Tariff Records, Subject to Further Review was issued by the Commission.
RP21-170	Texas Eastern Transmission, LP	10/30/2020	Intervened on 11/12/2020	TETCO filed revised tariff records proposing changes to its Applicable Shrinkage Adjustment (ASA) Percentages and ASA Surcharge rates. In addition, TETCO is also filing its Annual Interruptible Revenue Reconciliation Report. TETCO requests that the revised tariff records become effective December 1, 2020. TETCO's proposing changes to its ASA Surcharge rates will clear the net balance in the ASA Deferred Account as of August 31, 2020. For historic long-haul service, this filing implements a decrease in the annual average ASA Percentage of 0.21% and an increase in the ASA Surcharge of 0.0048 cents per dekatherm. For those system customers accessing the Market Area zones, this filing on average reduces fuel by 0.11%.	On 2/5/2021, the Commission issued a letter order accepting TETCO's filing.
RP21-185	Transcontinental Gas Pipe Line Company, LLC	11/2/2020	Intervened 0n 11/16/2020	Transco filed revised tariff records in order to track rate changes attributable to storage services purchased from Dominion Transmission, Inc. (Dominion) under its Rate Schedule GSS and rate changes attributable to storage services purchased from National Fuel Gas Supply Corporation (National Fuel) under its Rate Schedule SS-1. Transco requests that the revised tariff records become effective November 1, 2020. Dominion recently filed revised tariff records in Docket No. RP20-1245-000 in order to update its Electric Power Cost Adjustment and revised tariff records in Docket No. RP20-1246-000 in order to update its Transportation Cost Rate Adjustment. Included in those filings were revised rates under Dominion's Rate Schedule GSS that Transco uses to render service to its customers under its Rate Schedules GSS and LSS. The Commission accepted Dominion's revised tariff records effective November 1, 2020. National Fuel recently filed revised tariff records in Docket No. RP20-1250-000 in order to revise its Pipeline Safety Costs and Greenhouse Gas Costs Surcharge. Included in that filing were revised rates under National Fuel's Rate Schedule SS-1 that Transco uses to render service to its customers under its Rate Schedules LSS and SS-2. The Commission accepted National Fuel's revised tariff records effective November 1, 2020.	On 11/23/2020, the Commission issued a letter order accepting Transco's revised tariff records.
RP20-980	East Tennessee Natural Gas, LLC	6/30/2020	Intervened and protested on 7/13/2020	East Tennessee is filing a general section 4 rate case.	On 12/31/2020, ETNG filed a compliance filing.
RP20-614	Transcontinental Gas Pipe Line Company, LLC	2/28/2020	Intervened on 03/11/20	Transco is filing to revise the calculations establishing the prices used for cashing out monthly imbalances remaining at the time of final resolution, to be effective April 1, 2020. Transco proposes these revisions in order to reduce the incentive for Transco's shippers and parties to Operational Balancing Agreements to intentionally create large imbalances subject to cash-out for the purpose of taking advantage of differences between spot market prices and Transco's cash-out prices. Transco proposes to revise the calculation of its cash-out prices in order to reduce shippers' ability to predict and arbitrage cash-out pricing, thereby reducing shippers' incentive to create large imbalances and large imbalance swings at the end of the production month. Specifically, Transco proposes to calculate the arithmetic averages of the Platts Gas Daily, "Final Daily Price Survey" high Common and low Common index prices specified for each zone, using the seven highest daily prices and the seven lowest daily prices, respectively, in the relevant month. The arithmetic average of the seven highest daily high Common prices in the month will be the Reference Spot Price "Sell," and the arithmetic average of the seven lowest daily low Common prices in the month will be the Reference Spot Price "Buy." The proposed calculation will no longer use the published Midpoint prices, or the prices published for the first seven days of the subsequent month. In addition, Transco has included more than one reference index price for zones 2, 5, and 6 to provide a more accurate reflection of the market prices in those zones. In the zones where Transco has included more than one index spot price, the calculated high averages for each referenced index will be averaged to determine the Reference Spot Price "Sell" and the calculated low averages for each referenced index will be averaged to determine the Reference Spot Price "Buy." Transco proposes to use four new reference indexes in order to better reflect market prices in its cash-out prices. In addition, in response to concerns from shippers, Transco proposes to increase from 1,000 dt to 5,000 dt the imbalance tolerance levels that are cashed out at a non-penalty price or Weighted Average Spot Price, as applicable. Transco will no longer use two separate cash-out prices in Zone 6, one for OIA 3 and one for OIA 4, and instead will use a single cash-out price for Zone 6. However, imbalances will continue to be held by OIA in Zone 6. The purpose of this change is to disincentivize price arbitrage between OIA 3 and OIA 4. There were significant cash-out price differences between OIA 3 and OIA 4 in twenty of the twenty-four months, and Transco was often in the position of buying high and selling low.	On 11/09/2020, Zone 4/5 Customer Group filed its Answering Testimony.
RP19-351 -001	Tennessee Gas Pipeline Company, L.L.C.	1/28/2019	Intervened on 2/1/2019	TGP is requesting a second extension to file its 501-G filing, in order to allow more time to complete settlement discussions with customers, from the current due date of February 4, 2019 until April 5, 2019.	On 10/27/2020, the Commission issued a letter order accepting TGP's revised tariff records filed to comply with the Commission's order approving the amended and restated stipulation in this docket.

Piedmont's FERC Filing Activity

RP20-1160	Transcontinental Gas Pipe Line Company, LLC	9/1/2020	Intervened on 9/14/2020	Transco is filing revised tariff records to establish the initial recourse rates for the Southeastern Trail Project (Southeastern Project). Transco requests that the revised tariff records become effective November 1, 2020. In compliance with the Certificate Order, Transco is submitting a revised incremental reservation recourse rate and the system usage charge as the initial rates for the Southeastern Project. Transco is also filing actual tariff records setting forth the initial rates for the Southeastern Project no later than 60 days prior to the date the Southeastern Project facilities are expected to be placed into service.	On 10/21/2020, the Commission issued a letter order accepting Transco's filed tariff records.
RP20-988	Texas Eastern Transmission, LP	6/30/2020	Intervened on 7/13/2020	Texas Eastern (or TETCO) is filing revised tariff records to reflect the semi-annual Electric Power Cost (EPC) Adjustment. Pursuant to the GT&Cs of TETCO's tariff, it files revised rates on a semi-annual basis, effective each February 1 and August 1, for each applicable zone, rate schedule and incremental service, based upon the projected annual EPC required for the operation of transmission compressor stations with electric motor prime movers (Current Unit EPC Changes), and on an annual basis, effective each February 1, to reflect the EPC Surcharge for each applicable zone, rate schedule and incremental service, which is designed to clear the balance in the Deferred EPC Account and any sub-account. In the instant filing, TETCO has included revised Current Unit EPC Changes and an out-of-cycle updated EPC Surcharge to be effective August 1, 2020. This filing implements the Stipulation and Agreement filed in Docket No. RP19-343 (Settlement), which provides that credits and surcharges for Tracked Costs (including the EPC) will be applied by rate schedule for each Tracked Cost in the first Tracked Cost filing after the Settlement Effective Date. Accordingly, Texas Eastern asserts that this filing includes revised Current Unit EPC Changes and revised EPC Surcharges along with certain clean up edits of footnotes and references no longer applicable due to Texas Eastern's filings implementing the Tracked Costs updates agreed to in the Settlement.	On 10/30/2020, the Commission issued a letter order accepting TETCO's filing of a refund report.
RP20-1194	Texas Eastern Transmission, LP	9/16/2020	Intervened on 9/28/2020	TETCO is filing to request approval of a Settlement that implements the agreed upon framework and filing format for TETCO's imbalance resolution process. TETCO requests that the Commission rule on the Settlement no later than October 23, 2020. The Settlement requires TETCO to calculate and reflect net proceeds from the imbalance resolution procedures separately, for each transportation path, in an Annual ASA Filing. Additionally, the Settlement requires TETCO to include a schedule illustrating the allocation of the ASA monetary account balance, the allocation factor, the allocation of the ASA monetary imbalance amount, the total shrinkable determinants, and the imbalance amount for forward haul paths and partial backhaul paths for each transportation path in the Annual ASA Filing. TETCO states that these changes provide additional information for greater transparency and do not result in changes to cost allocation or rate design principles. The Settlement also imposes a moratorium. Specifically, the Settlement provides that neither TETCO, nor any other Settlement party, may make a filing or request pursuant to the NGA to revise any provision of the Settlement with a filing date prior to October 31, 2022, or with a proposed effective date prior to December 1, 2022. The Settlement also requires TETCO to file a revised a tariff record to implement the Settlement and provides that the Settlement parties will support or not oppose the revised tariff record. The Settlement will become effective on the first day of the first calendar month following the date on which TETCO receives as a final Commission order, no longer subject to rehearing or appeal, approving the Settlement as filed and without any material condition or modification; provided that, if the Commission order approves the Settlement with modifications acceptable to all of the Settlement parties, then the parties may agree that the order is a final Commission order.	On 10/23/2020, the Commission issued a latter order approving TETCO's stipulation to address its imbalance resolution process.
RP21-34	Transcontinental Gas Pipe Line Company, LLC	RP21-34	Intervened and joined in on Zone 4/5 Customer Group on 10/13/2020	Transco is filing to request a limited waiver of Section 284.12(b)(2)(i), the requirement to enter into Operational Balancing Agreements (OBA) at all points of interconnection between a pipeline's system and the system of another pipeline, applicable to the four points of interconnection between Transco's system and the TC Pipelines (ANR, Columbia Gulf and Columbia Gas). Transco requests that the waiver be made effective November 1, 2020.	On 10/30/2020, the Commission issued its Order Denying Waiver, citing concerns that shippers could be harmed by shifting to them the risks of imbalances at those interconnections as well as the associated imbalance penalties.
RP21-24	Transcontinental Gas Pipe Line Company, LLC	10/1/2020	Intervened on 10/13/2020	Related to Transco's proposal to implement a surcharge to recover its under-recovered cashout balance in RP20-618, and the Commission's March 30th order accepting and suspending the revised tariff records, Transco is filing revised tariff records to implement a surcharge rate to recover from customers amounts in its Cash-Out Deferred Account. Transco requests that the revised tariff records become effective November 1, 2020.	On October, 30, 2020 the Commission issued its Order Accepting and Suspending Tariff Records, Subject to Refund and Conditions. The acceptance is conditioned on the outcome of hearing procedures in Docket No. RP20-618.
RP20-1111	Transcontinental Gas Pipe Line Company, LLC	8/20/2020	Intervened on 9/1/2020	Transco is filing to revise Section 49 of the GT&Cs of its Tariff, which sets forth the procedures for allocating existing firm capacity that becomes available on its system. Transco states that it seeks to revise Section 49 in order to allow for greater flexibility in determining the highest NPV. Specifically, Transco proposes to add subsection 49.2(a)(i) to expand the possible factors upon which the NPV calculation may be based, including the term, quantity, the date on which the requested service is requested to commence, and other factors determined to be relevant by Transco, and to provide that Transco will set forth the determinative factors in its open season posting. In addition, proposed subsection 49.2(a)(i) provides Transco with the option to aggregate two or more bids for one or more bid packages. Finally, proposed subsection 49.2(a)(ii) provides that Transco will post on 1Line the NPV analysis used to determine the successful bidder or bidders.	On 1/19/2021, the Commission issued its Notice of Denial of Rehearing by Operation of Law and Providing Further Consideration. On 1/29/2021, the Commission issued its Order Addressing Arguments Raised on Rehearing.
RP20-1060	Columbia Gas Transmission, LLC	7/31/2020	Intervened on 8/12/2020	TCO is filing a general section 4 rate case.	On 11/03/2020, TCO filed a motion for Protective Order that was approved by Commission Order on 11/04/2020. On 11/04/2020, the Commission issued an Order consolidating this docket with RP20-1159. On 11/04/2020, the Indicated Consumer Advocates filed a motion for summary rejection. TCO filed an answer to this motion on 11/19/2020.
RP20-1196	Transcontinental Gas Pipe Line Company	9/16/2020	Intervened on 9/28/2020	Transco is filing its annual cash-out report for the period of August 1, 2019, through July 31, 2020 (Annual Period). The Cash-Out Report reflects the cash-out quantities purchased and sold and the amounts paid to or by each shipper or Operational Balancing Agreements (OBA) party. Additionally, the Cash-Out Report compares Transco's cash-out and OBA revenues received with the costs incurred for the current annual billing period. Transco reports that as of the end of the Annual Period, on a cumulative basis Transco's costs exceeded its revenues by $67,703,160. Transco states that in accordance with Section 15(d) of the GT&C, Transco will calculate a surcharge applicable to the annual period commencing November 1, 2020, and ending October 31, 2021, based on the under recovery balance at July 31, 2020, and submit a filing containing this surcharge rate at least 30 days prior to November 1, 2020. The Cash-Out Report states that PNG purchased 9,731 Dt of gas and sold 160 Dt of gas, with a net amount of 9,571 Dt. This translates to $23,660.81 of gas purchased, $262.06 of gas sold, with a net amount of $23,398.75.	
RP20-1159	Columbia Gas Transmission, LLC	9/1/2020	Intervened on 9/14/2020	TCO is filing proposed tariff records to comply with the Commission's January 23, 2020 order issuing a certificate and approving abandonment for the Buckeye XPress Project (Certificate Order). TCO requests that the Commission accept the proposed tariff records to become effective November 1, 2020, the anticipated in-service date for the Buckeye XPress Project. In compliance with the Certificate Order, TCO is submitting a recalculated Buckeye XPress Project incremental reservation rate of $13.081 per Dth. TCO states that the recalculated reservation rate reflects the removal of $17,162,272 of costs for existing capacity reserved for the Buckeye Xpress Project. Additionally, TCO is submitting a "live" tariff section FTS-BXP Rates to place into effect the recalculated incremental reservation charges applicable to Buckeye XPress Project shippers.	

Piedmont's FERC Filing Activity

RP20-813	Columbia Gas Transmission, LLC	4/29/2020	Intervened on 5/11/2020	Columbia Gas is filing revisions to the GT&Cs of its Tariff to allow for the recontracting of capacity. Columbia Gas requests that the proposed tariff changes become effective June 1, 2020. The proposed tariff revisions would allow Columbia Gas and a shipper to mutually agree to recontract an existing firm service agreement. Specifically, a shipper and Columbia Gas may mutually agree to terminate a firm service agreement early in exchange for the shipper making use of either some portion of its underlying capacity or generally available unsubscribed capacity. In the event of an early termination of a firm service agreement, a shipper may make use of some portion of its underlying capacity without such capacity first being subject to an open season posting or posted as unsubscribed, available capacity. Columbia Gas states that the tariff revisions enable Columbia Gas and a shipper to determine if it is in the best interest of both parties to renegotiate or repurpose an existing service agreement. Similar to the filing above, while the proposed tariff revisions do not appear to present any adverse risk/impact to Piedmont, we recommend intervening because substantive tariff changes are being proposed.	Several other interventions were filed.
RP20-779	Transcontinental Gas Pipe Line Company, LLC	4/22/2020	Intervened on 4/22/20.	Transco is filing to revise the minimum bid periods required for open seasons for available capacity in Section 49 of the GT&C of its Tariff, to be effective May 11, 2020. Transco proposes to revise Section 49 of the GT&C to shorten the minimum bid periods to the following periods: (i) four hours for capacity available for one month or less; (ii) two business days for capacity available for more than one month but less than one year; and (iii) five business days for capacity available for more than one year.	On 7/16/2020, the Commission issued an order denying DEC, DEP, and DEF's request for rehearing and modifying the discussion in its 4/28/2020 order.
RP20-857	Columbia Gas Transmission, LLC	5/1/2020	Intervened on 5/13/2020	Columbia Gas is filing revisions to the GT&Cs of its Tariff to revise the method by which it determines the volumes to which reservation charge credits (RCCs) apply, and to reflect its election to change the method by which RCCs are calculated to the Safe Harbor method. Columbia Gas requests that the proposed tariff changes become effective June 1, 2020. Revised Methodology to Determine Volume Eligible for RCCs Under TCO's current tariff, RCCs apply to gas quantities up to a shipper's contract transportation demand that Columbia is unable to schedule and/or deliver under its firm services, which are nominated in the timely cycle and renominated in the evening cycle, and whose applicable supply, transportation, and/or market upstream of or downstream from Columbia's system can be confirmed. Each day's credit is payable on the sum of 100% of the total of the quantities nominated by a shipper in the timely cycle and renominiated in the evening cycle minus the total quantities actually delivered by the shipper that day. The proposed tariff revisions calculate RCCs owed to shippers based on a historical average of usage instead of quantities nominated and/or confirmed for scheduling when proper notification of the unavailability of service is provided to shippers. Further, Columbia Gas is proposing that only firm service that is affected by an event shall be included in the daily usage utilized to calculate a shipper's 7-day historical average daily usage. Columbia Gas is also proposing to change its method of calculating RCCs during force majeure events from the No-Profit method to the Safe Harbor method.	On 5/29/2020, the Commission issued an order accepting the revised tariff records. On 6/10/2020, pursuant to the Commission's May 29,. 2020 order, TCO filed revised tariff records. On 6/26/2020, the Commission issued a letter order accepting TCO's revised tariff records.
RP20-726	East Tennessee Natural Gas, LLC	3/30/2020	Intervened on 5/1/2020	East Tennessee is filing its annual cashout report for November 2018 through October 2019. The 2018-2019 Cashout Report reflects a net loss from cashout activity of $6,841,882. In accordance with its Rate Schedules LMS-MA, LMS-PA, and PAL, East Tennessee's 2017-2018 Cashout Report net loss balance of $12,073,436 will be applied to the current year's net loss of $6,841,882 to obtain a 2018-2019 Cashout Report net loss balance of $18,915,318 to be carried forward to the next annual cashout report.	
RP20-621	Tennessee Gas Pipeline Company, L.L.C.	2/28/2020	Intervened on 03/11/2020	Tennessee is filing to implement a new flexible firm storage service under Rate Schedule FS-F (the FS Flex service). Tennessee proposes to use the storage capacity and deliverability from a firm storage contract Tennessee has entered into with Pine Prairie Energy Center, LLC (the "Pine Prairie SBO Contract") to support its proposed FS Flex service at market-based rates. The Pine Prairie SBO Contract, has a 10 year term, is subject to market-based rates, and provides TGP with 8,000,000 Dth of firm storage rights, 200,000 Dth/day of firm injection rights and 400,000 Dth/day of firm withdrawal rights at a service point located at the interconnect of Tennessee's 800 Line system with the Pine Prairie Energy Center facility. Tennessee states that the FS Flex service is designed to meet the needs of LNG customers and other market participants in the Gulf Coast region. Tennessee expects significant interest in the	On 5/28/2020, the Commission issued a letter order accepting Tennessee's May 4, 2020 filing to implement its Rate Schedule FS-F.
RP20-995	Columbia Gas Transmission, LLC	7/1/2020	Intervened on 7/13/2020	TCO is filing revised tariff records to adjust its Transportation Costs Rate Adjustment (TCRA) for known and measurable changes subsequent to the filing of its Annual TCRA Filing on February 28, 2020, in Docket No. RP20-622-000 (2020 Annual TCRA Filing). TCO's2020 Annual TCRA Filing included $51,170,190 in projected Operational 858 Costs for the period April 1, 2020, through March 31, 2021. TCO states that the $51,170,190 amount included $33,413,273 associated with firm and interruptible transportation contracts with Texas Eastern (Projected Texas Eastern Transportation Costs) and $295,563 associated with a firm transportation contract with National Fuel (Projected National Fuel Transportation Costs). In the instant filing, TCO is proposing to decrease its Projected Texas Eastern Transportation Costs from $33,413,273 to $23,978,384 and increase its Projected National Fuel Transportation Costs from $295,563 to $347,769.13. TCO explains that any future refunds or rate adjustments arising from the settlements of the Texas Eastern and National Fuel Rate Cases will be reflected in TCO's next TCRA filing.	On 7/30/2020, the Commission issued a letter order accepting TCO's tariff records.
RP10-837	Dominion Transmission, Inc.	6/30/2020	Intervened on 7/13/2020	DETI is filing its annual report of operational sales of gas for the period of April 1, 2019, through March 31, 2020. DETI reports that the total quantity of gas sold for the year ending March 31, 2020, was 2,600,000 Dth/d for a total cost of $6,020,000. By way of comparison, DETI's operational gas sales report for the year ending March 31, 2019, reflected 4,850,000 Dth/d of gas sold for a total cost of $15,616,500.	
RP20-751	Columbia Gas Transmission, LLC	4/1/2020	Intervened on 4/13/20	Columbia is filing tariff sections to adjust its Operational Transaction Rate Adjustment ("OTRA") for the upcoming 2020 summer season, to become effective May 1, 2020. Columbia is proposing to lower its OTRA monthly reservation rate for the 2020 summer season to $0.039/Dth for Rate Schedule FTS service from the existing 2019 winter season rate of $0.089/Dth. When compared to the 2019 OTRA winter season, the decrease reflects a reduction in the OTRA surcharge costs of approximately $1.9 million, a decrease of approximately $1.2 million in under-recovered OTRA true-up surcharge costs, and an increase in seasonal billing determinants to approximately 97,000,000 Dths. Columbia states that the proposed OTRA monthly reservation rates are lower than the rates implemented in its previous summer season OTRA filing and that the reduction is primarily driven by a decrease in the under-recovered true-up surcharge when compared to Columbia's previous summer season OTRA filing.	Several other interventions were filed. On 4/21/20, a letter order accepting Columbia's filing of Tariff records to reflect its operational transaction rate adjustment for the upcoming 2020 summer season was issued.

Piedmont's FERC Filing Activity

RP20-761	Hardy Storage Company, LLC	4/1/2020	Intervened on 4/13/2020	Hardy is filing to adjust its retainage percentage consistent with its Retainage Adjustment Mechanism, to become effective May 1, 2020. Hardy is proposing to revise its total retainage rate from 0.536% to 3.092%, an increase of 2.556%, to become effective May 1, 2020. The proposed 3.092% total retainage rate reflects a 2.015% current Company Use projection component with an associated under-collection surcharge of 0.457%, and a current LAUF projection component of 0.241% with an associated under-collection surcharge of 0.379%. Hardy ended calendar year 2019 in a total under-collected position of 100,297 Dth. In calculating its retainage requirements, Hardy uses the actual Company Use and LAUF volumes from its most recent 12-month operating period in its calculation of the Company Use and LAUF surcharge component for the upcoming 12-month period. As reflected in the workpapers included with this filing, as of December 31, 2019, Hardy has an under-recovery of its Company Use and LAUF gas quantities of 53,114 Dth and 47,183 Dth, respectively. Hardy explains that this is a material change from the prior year where Hardy ended calendar year 2018 in a total over-collected position of 196,088 Dth, reflecting a Company Use over-collection of 36,676 Dth and a LAUF over-collection of 159,412 Dth. Consequently, last year's retainage rate included over-collection surcharges of negative 0.290% and negative 1.134% for Company Use and LAUF, respectively. Therefore, the majority of the 2.556% increase to the total proposed retainage rate is the result of a reversal in the surcharge components from negative to positive for both Company Use and LAUF from the prior year's filing. Hardy notes that the projected Company Use percentage only increases from 1.818% to 2.015%. In summary, the adjustments to the retainage percentages are as follows: (Over)/Under Collection Surcharge Percentages: Company Use Gas -0.290 0.457% Lost and Unaccounted For Gas -1.134 0.379% Total (Over)/Under Collection Surcharge -1.424 0.836% Current Percentages: Company Use Gas 1.818 2.015% Lost and Unaccounted For Gas 0.142 0.241% Total Current Percentages 1.960 2.256% Total Retainage Percentage: Company Use Gas 1.528 2.472% Lost and Unaccounted For Gas -0.992 0.620% Total Retainage Percentage 0.536 3.092% In light of the significant increase, we recommend that Piedmont intervene in this docket.	Several other interventions were filed. On 4/21/20, Hardy filed a Motion for Leave to Answer and Answer of Hardy.
RP20-615	Columbia Gas Transmission, LLC	2/28/2020	Intervened on 03/11/2020	Columbia is filing a revised section of the Currently Effective Rates set forth in its Tariff, to adjust Columbia's retainage percentage consistent with the pipeline's Retainage Adjustment Mechanism, to become effective April 1, 2020. This revision represents Columbia's annual RAM filing to effectuate an adjustment to Retainage Percentages for prospective changes and unrecovered quantities. There are no substantive changes to Retainage Percentages with the exception of the Ohio Storage Gas Loss Retainage Percentage. The calculation of the Ohio Storage Retainage Percentage is based on the 2019 annual turnover of approximately 3 Bcf, compared to the prior's year's filing, which was based on the 2018 annual turnover of approximately 4 Bcf. In addition, due to a decrease in the 2019 actual versus projected turnover, the retainage surcharge reflects an under-recovery of 9,815 Dths, in contrast to last year's retainage surcharge which was based on an over-recovery of 4,346. Consequently, Columbia proposes to increase the Ohio Storage Retainage Percentage from its current 0.470% rate to 1.220%. Piedmont typically intervenes in TCO's RAM filings. As such, we recommend intervening.	Several interventions were filed. On 03/27/20, a letter order accepting Columbia's tariff record filing to reflect the adjustment of its retainage percentage consistent with the RAM in its tariff was accepted.
RP20-620	Columbia Gas Transmission, LLC	2/28/2020	Intervened on 03/11/2020	Columbia is filing to establish Columbia's Electric Power Costs Adjustment ("EPCA") for the annual period beginning April 1, 2020. For the twelve-month period commencing April 1, 2020, the time-period utilized to determine the Current EPCA Rate, Columbia proposes to collect $31,187,581 in annual electricity costs, compared to $28,356,475 in annual electricity costs proposed to be collected for the twelve-month period commencing April 1, 2019, included in last year's EPCA filing. For the Unrecovered EPCA Surcharge, Columbia incurred an over-collection of $616,486 in Electric Power Costs. The increase in Columbia's Electric Power Costs is primarily due to a full year of projected Mountaineer XPress Project throughput and the projected electric costs associated with the Ceredo Compressor Station.	Several interventions were filed. On 03/18/20, a letter order accepting Columbia's filing of tariff records to reflect the establishment of its electric power costs adjustment for the annual period beginning 04/01/2020 was issued.

Exhibit___ (JCP-7)

Design Day Temperature

DESIGN DAY WINTER 21-22

Calculated Weighted Average Temperature - 1/21/1985 - Carolinas

With 2021 Weights Across Weather Stations

High Temp	Low Temp	Avg Temp **	Weather Station	Weighting *	Weighted Avg
1	-12	-5.5	GEV	0.00514303	-0.02828664
21	-8	6.5	GSO	0.28427454	1.84778452
24	-5	9.5	CLT	0.32105776	3.050048695
23	-8	7.5	HKY	0.05605177	0.420388306
26	-4	11	GSP	0.16999264	1.869919042
16	-2	7	ECG	0.00871322	0.060992558
18	-1	8.5	POB	0.05343834	0.45422593
18	-1	8.5	GWW	0.08028799	0.682447899
27	5	16	ILM	0.02104071	0.336651298
			Weighted Average Temperature		**8.69**

* Using calculated weightings based on data from 4/1/20 to 3/31/21 56.31

** Average of high and low temperatures

Exhibit___ (JCP-8)

Piedmont Natural Gas Company, Inc.
Docket No. 2021-4-G

Exhibit_(JCP-8)

Total Firms Sales Demand Comparison

(All Values in Dt/d)

Design Day Forecast 2021 - 2022		**Total Carolinas**
Previous Methodolody (Firm Sales & Firm Transport)		
	Total Firm Sales usage for total 56.31 HDDs	1,437,965
Refinement of methodology (Firm Sales Only)		
	Total Firm Sales usage for total 56.31 HDDs	1,431,452
	Variance	6,513